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May 26, 2004

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AWVSP Team Office

Ms. Allison Ray
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, Washington 98104

Dear Ms. Ray:

Thank you for the opportunity to comment on the Alaskan Way Viaduct and Seawall Replacement Project Draft Environmental Impact Statement.

The Alaskan Way Viaduct and Seawall Replacement Project is the single most important transportation project in the State of Washington. Only the SR-520 Bridge approaches the viaduct in the danger it poses to the safety of the Central Puget Sound region's residents and the health of our state's economy. Therefore, replacing the viaduct in a timely manner is the top priority of the Greater Seattle Chamber of Commerce and should have first call on state and regional investments in our transportation infrastructure.

Replacing the viaduct also presents us with tremendous economic development potential. The opportunity to replace an aging, unsafe structure and at the same time open up the waterfront to the central business district should not be missed, if we can realistically achieve such a goal.

The Greater Seattle Chamber of Commerce supports replacing the Alaskan Way Viaduct with a tunnel, as outlined in the DEIS.

The benefits of the tunnel option are numerous, including the following:

Economic Development
The economic development potential of the tunnel option is far greater than any similar potential in the other options outlined in the DEIS. The central waterfront is currently underutilized in comparison to those of other major seaport cities. By reconnecting our region to the Central Waterfront and opening up dozens of acres for redevelopment, open space and view corridors we will allow for numerous creative opportunities to make Seattle and the Puget Sound region a more vibrant, attractive place for business.

The Final EIS should include a quantitative and qualitative report on the economic development benefits of the tunnel option.

Construction Impacts
The tunnel option consists in actuality of two separate tunnels – one under the footprint of the current viaduct and one immediately west of it. The western tunnel can be built and begin receiving traffic prior to demolition of the viaduct. Therefore, the tunnel option allows for the least disruption to the SR-99

corridor, and consequently to both the I-5 and I-405 corridors as well, during demolition of the viaduct and construction of the eastern tunnel. No other option in the DEIS allows for as little disruption to usage of our region's current transportation system.

Efficiencies with Seawall Construction
By combining replacement of a portion of the Seawall with the western wall of the tunnel, we can capitalize on efficiencies, getting both elements of the project for considerably less than it would cost to build a tunnel and a seawall independent of one another.

Support for the tunnel option is not unqualified, however. Among our concerns are the following:

Freight Mobility
The ability of industrial and manufacturing businesses to transport freight of all kinds between Ballard and the industrial areas south of downtown – as well as the ability to use the SR-99 corridor to move freight through Seattle to and from other parts of the region – must be preserved. Specifically, the ability to transport hazardous and flammable materials through any tunnel that is ultimately built must not diminish from current levels on the existing viaduct.

Funding
Any realistic option to replace the viaduct will cost at least $3.1 billion, with most of the alternatives studied in the EIS in the $3.2 billion to $3.5 billion range. Building a tunnel is estimated to cost $3.8 billion to $4.1 billion, representing an incremental change of between $300 million and $900 million. Innovative financing must be implemented to meet this incremental need. Capitalizing on the value that the removal of the Alaskan Way Viaduct will create throughout downtown Seattle must be a part of any funding plan for building a tunnel. Realistic options include a Local Improvement District or Tax Increment Financing (TIF), if TIF is ever allowed in the State of Washington.

Capacity
Losing capacity in the SR-99 corridor cannot be an option in the planning process. The 122,000 vehicle capacity in the tunnel and 21,000 vehicle capacity along Alaskan Way, as outlined in the DEIS, are both encouraging figures. This level of capacity must be maintained as the project is engineered and constructed.

Commitment to the Entire Project
Because the tunnel option is the most expensive among those explored in the DEIS, it runs the greatest risk of failing to be fully funded. The Chamber is concerned that work on northern or southern elements of the SR-99 corridor could be more expensive than anticipated, leaving too few resources to complete the tunnel. In such a situation, the risk exists that we will be left with the ability to only complete a surface option or a modified aerial structure, both of which are far inferior to a tunnel. Therefore it is vital that the southern portion of the corridor and the central waterfront portion be built concurrently as a single project, with a commitment to funding the entire project to completion.

Security
Because the western wall of the tunnel will also serve as the seawall, the seawall will appear to be more vulnerable to acts of malice than was previously the case. Such acts could therefore put the central business district in jeopardy of a seawall collapse. Preventative measures must be taken in order to secure the safety of everyone in the waterfront area and throughout the core business district.

North Terminus
The DEIS identifies three options for improving the East-West connections immediately North of the Battery Street Tunnel. If the incremental costs of this alternative can be covered by sources outside of the Viaduct project the lowered Aurora alternative appears to be the superior choice. This alternative provides the best opportunity for reconnecting the street grid, thereby knitting back together the South Lake Union and Lower Queen Anne neighborhoods and improving traffic flow on the Mercer corridor, without disrupting the flow of traffic on the Alaska Way Viaduct.

The Greater Seattle Chamber of Commerce will monitor progress on this vital transportation project and reserves the right to further comment or change its position as events unfold.

Again, thank you for the opportunity to comment on this important Draft EIS. The Chamber looks forward to working with the project proponents to improve this vital transportation corridor.

Sincerely,

Steve Leahy
President & CEO